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**NAVAJO GENERATING STATION**

P. O. BOX 850

PAGE, ARIZONA 86040

January 30, 2018

Dr. Donald Benn, Executive Director  
Navajo Environmental Protection Agency  
P.O. Box 339  
Window Rock, AZ 86515

Director, Air Division  
U.S. Environmental Protection Agency, Region IX  
Mail Code: AIR-5  
75 Hawthorne Street  
San Francisco, CA 94105

**Re: Navajo Generating Station  
Annual Compliance Certification and Semiannual Monitoring Report  
Permit No. NN-ROP-05-06**

Dear Dr. Benn:

As required by 40 CFR § 71.6(a)(5), 40 CFR § 71.6(a)(3)(iii)(A), and Conditions IV.C and III.C.1 of the above referenced permit, please find enclosed the Annual Compliance Certification (Attachment 1) and Semiannual Monitoring Report (Attachments 2 through 4) for Navajo Generating Station. Also enclosed, is the required Certification of Truth, Accuracy, and Completeness (Attachment 5).

Please feel free to contact me at (928) 645-6217 if you have any questions.

Sincerely,

A handwritten signature in black ink, which appears to read "Ed L. for KJF". The signature is written in a cursive, flowing style.

Kenneth J. Frazier  
Manager

***Certified Mail***

cc: Bill McClellan, SRP

**Attachment 1. Annual Compliance Certification**



OMB No. 2060-0336, Approval Expires

04/30/2012

Federal Operating Permit Program (40 CFR Part 71)

**ANNUAL COMPLIANCE CERTIFICATION (A-COMP)**

**A. GENERAL INFORMATION**

Permit No. NN-ROP-05-06

Reporting Period: Beg. 01 / 01 / 2017 End. 12 / 31 / 2017

Source / Company Name SRP Navajo Generating Station

Mailing Address: Street or P.O. Box P.O. Box 850

City Page State AZ ZIP 86040 -

Contact person Kenneth J. Frazier Title Plant Manager

Telephone ( 928 ) 645 - 6217 Ext.

Continued on next page

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

Operate in compliance with Acid Rain permit and application (Condition II.A.).

Compliance Methods for the Above (Description and Citation):

Records demonstrating compliance with the facility's Acid Rain permit and application are maintained on site and by the Designated Representative.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

SO<sub>2</sub> emissions less than or equal to 0.10 lb/MMBtu on a rolling 365 boiler operating day plantwide basis (Condition II.B.2).

Compliance Methods for the Above (Description and Citation):

SO<sub>2</sub> emissions are monitored using CEMS in accordance with the Acid Rain Program requirements and the requirements of the Visibility FIP. Records of CEMS measurements are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

Calculate weighted plant-wide annual average SO<sub>2</sub> emission rate daily (Condition II.B.3).

Compliance Methods for the Above (Description and Citation):

Records of daily calculations of weighted plant-wide average SO<sub>2</sub> emissions are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

Install, maintain, and operate CEMS to determine compliance with the plant-wide SO<sub>2</sub> limit (Condition II.B.4).

Compliance Methods for the Above (Description and Citation):

Records pertaining to the installation, maintenance, and operation of the SO<sub>2</sub> CEMS are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance



**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

Quarterly report and maintain records of SO<sub>2</sub> and diluent emission data according to the procedures set forth at 40 CFR 60.7, and report daily electric energy generation (Condition II.B.5a, 5b, and 5c).

Compliance Methods for the Above (Description and Citation):

Copies of the required reports and emissions data are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

Notify EPA of SO<sub>2</sub> control system outages within 1 business day and submit a follow-up report within 30 days of repairs (Condition II.B.5d).

Compliance Methods for the Above (Description and Citation):

Outages are recorded on the CEMS DAHS, and the data is checked by environmental staff each business day. Copies of notifications to EPA of control system outages are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

Operate all equipment and systems consistent with good engineering practices (Condition II.B.8).

Compliance Methods for the Above (Description and Citation):

Records of the operation and maintenance of process and control equipment are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

Prepare and submit an annual long-term maintenance plan to EPA, notify EPA if less than full scheduled maintenance were conducted for the period covered by the previous plan, and explain how the facility qualified for a maintenance scheduling exception (if applicable) (Conditions II.B.9 and 10).

Compliance Methods for the Above (Description and Citation):

Copies of the required maintenance plans, records of maintenance activities, and copies of notifications are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): LT1-LT14

Permit Term (Describe requirements and cross-reference)

NSPS for Nonmetallic Mineral Processing Plants. 40 CFR Part 60, Subparts A and OOO. (1) PM emissions from limestone dust collector stacks less than or equal to 0.022 gr/dscf; (2) Opacity from limestone dust collector stacks less than or equal to 7%; (3) Opacity from limestone handling fugitive sources, except crushers, less than or equal to 10%; (Condition II.D).

Compliance Methods for the Above (Description and Citation):

PM emissions performance testing is required once per permit term for DC9, DC10, and DC11, or within 120 days of any 12-month period in which visual emissions are observed 3 times. Weekly visual emissions surveys are conducted for baghouses DC9, DC10, and DC11. Copies of test reports and records of weekly visual emissions surveys are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): DC9, DC10, DC11

Permit Term (Describe requirements and cross-reference)

Emissions testing for PM (Method 5 or 17) once per permit term, and additionally within 120 days if visible emissions are observed three times from any single baghouse in any 12 month period. Provide copies of test reports to EPA (Condition II.C.4, II.E.1).

Compliance Methods for the Above (Description and Citation):

Copies of PM performance test reports are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): DC9, DC10, DC11

Permit Term (Describe requirements and cross-reference)

Weekly visual emissions survey for each baghouse, and Method 9 within 24 hours of observing any visible emissions (Condition II.C.5, II.E.2). Keep records for each observation (Condition II.E.3).

Compliance Methods for the Above (Description and Citation):

Records of weekly visual emissions surveys are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): LT1-LT14

Permit Term (Describe requirements and cross-reference)

Keep records of the occurrence and duration of any startup, shutdown, and malfunction of affected facilities; malfunction of air pollution control equipment; and periods during which continuous monitoring devices are inoperative (Condition II.C.2).

Compliance Methods for the Above (Description and Citation):

Operating records for affected facilities and control equipment are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): LT1-LT14

Permit Term (Describe requirements and cross-reference)

At all times, maintain and operate equipment, to the extent practicable, consistent with good air pollution control practices for minimizing emissions (Condition II.C.7).

Compliance Methods for the Above (Description and Citation):

Maintenance and operating records are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): Plantwide

Permit Term (Describe requirements and cross-reference)

Conduct testing in accordance with the generic requirements for testing contained in the permit (Condition III.A).

Compliance Methods for the Above (Description and Citation):

Copies of test plans and test reports containing information required by the generic testing requirements of the permit are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

<p>Emission Unit ID(s): Plantwide</p> <p>Permit Term (Describe requirements and cross-reference) Keep records of required monitoring information for at least 5 years (Condition III.B).</p> <p>Compliance Methods for the Above (Description and Citation): Monitoring records are maintained on site.</p> <p>Status (Check one): <input type="checkbox"/> Intermittent Compliance <input checked="" type="checkbox"/> Continuous Compliance</p>
<p>Emission Unit ID(s): Plantwide</p> <p>Permit Term (Describe requirements and cross-reference) Submit semiannual monitoring reports (Condition III.C.1) and an annual compliance certification (Condition IV.C).</p> <p>Compliance Methods for the Above (Description and Citation): Copies of monitoring reports and compliance certifications are maintained on site.</p> <p>Status (Check one): <input type="checkbox"/> Intermittent Compliance <input checked="" type="checkbox"/> Continuous Compliance</p>
<p>Emission Unit ID(s): Plantwide</p> <p>Permit Term (Describe requirements and cross-reference) Report deviations promptly (Condition III.C.2 and 3).</p> <p>Compliance Methods for the Above (Description and Citation): No permit deviations occurred during the reporting period. Records of historic deviations reports are maintained on site.</p> <p>Status (Check one): <input type="checkbox"/> Intermittent Compliance <input checked="" type="checkbox"/> Continuous Compliance</p>
<p>Emission Unit ID(s): Plantwide</p> <p>Permit Term (Describe requirements and cross-reference) Comply with stratospheric ozone provisions of 40 CFR Part 82 (Condition III.D).</p> <p>Compliance Methods for the Above (Description and Citation): Records required by 40 CFR Part 82 are maintained on site.</p> <p>Status (Check one): <input type="checkbox"/> Intermittent Compliance <input checked="" type="checkbox"/> Continuous Compliance</p>

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions

Emission Unit ID(s): Plantwide

Permit Term (Describe requirements and cross-reference)  
Comply with Asbestos NESHAP provisions (Condition III.E).

Compliance Methods for the Above (Description and Citation):  
Records of demolition and renovation activities are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): Plantwide

Permit Term (Describe requirements and cross-reference)  
Complete a fee calculations worksheet form and pay annual permit fees by April 1 of each year (Condition IV.A).

Compliance Methods for the Above (Description and Citation):  
Copies of emission fee calculations worksheets and records of emission fee payments are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)  
Submit notification of the date construction of Low-NOx Burners and Separated Overfire Air (LNB/SOFA) is commenced, postmarked within 30 days of such date. (PSD Permit AZ 08-01A Condition II.A)

Compliance Methods for the Above (Description and Citation):  
Notification was submitted for Unit 3 on February 19, 2009 and for Unit 2 on February 22, 2010, and for Unit 1 on February 17, 2011.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)  
Submit notification of the date upon which initial performance tests will commence, postmarked not less than 30 days prior to such date. (PSD Permit AZ 08-01A Condition II.C)

Compliance Methods for the Above (Description and Citation):  
Notification was submitted for Unit 3 on March 5, 2009 and for Unit 2 on March 11, 2010 and Unit 1 on April 4, 2011.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): U1,U2, U3

Permit Term (Describe requirements and cross-reference)

Submit notification of the date upon which initial performance evaluation of the CEMS will commence, postmarked not less than 30 days prior to such date. (PSD Permit AZ 08-01A Condition II.D)

Compliance Methods for the Above (Description and Citation):

Notification was submitted for Unit 3 on March 5, 2009 and for Unit 2 on March 11, 2010 and Unit 1 on April 4, 2011.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

Prior to commencement of installation, submit design specifications of the LNB/SOFA system to be installed. (PSD Permit AZ 08-01A Condition IX.A.1)

Compliance Methods for the Above (Description and Citation):

Notification was submitted for Unit 3 on January 23, 2009 and for Unit 2 February 22, 2010 and Unit 1 on February 17, 2011.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

At least one month prior to the date of initial startup, submit an LNB/SOFA system operating plan. (PSD Permit AZ 08-01A Condition IX.A.2)

Compliance Methods for the Above (Description and Citation):

Notification was submitted for Unit 3 on February 19, 2009 and for Unit 2 on February 22, 2010 and Unit 1 on February 17, 2011.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

Within 60 days of installation of the low-NOx burners, install, and thereafter operate, maintain, certify, and quality assure CEMS for CO (PSD Permit AZ 08-01A Condition IX.E.1). Submit CO CEMS performance test protocol 30 days prior to test date, and results of performance test within 60 days of completion (PSD Permit AZ 08-01A Condition IX.E.5 and IX.E.6).

Compliance Methods for the Above (Description and Citation):

Copies of the performance test protocol (submitted for Unit 3 on March 5, 2009 and Unit 2 on March 11, 2010 and Unit 1 on April 4, 2011) and performance test results (submitted for Unit 3 on June 7, 2009 and for Unit 2 on July 1, 2010 and Unit 1 on June 28, 2011) are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

Following initial startup of low-NOx burners,  $\text{NO}_x \leq 0.24 \text{ lb/MMBtu}$ ,  $\text{CO} \leq 0.23 \text{ lb/MMBtu}$  on a 30-day rolling average basis and  $\text{CO} \leq 0.15 \text{ lb/MMBtu}$  on a 12-month rolling average basis (PSD Permit AZ 08-01A Condition IX.B.2 and Condition IX.B.1.a & b.). Submit excess emission reports semiannually 30 days after the end of each calendar quarter (PSD Permit AZ 08-01A Condition IX.G.5).

Compliance Methods for the Above (Description and Citation):

Copies of the quarterly excess emissions reports for this reporting period are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

Conduct a thirty day initial performance test for CO and NOx using the CEMS. Submit a report within 30 days of completion of the test (PSD Permit AZ 08-01A Condition IX.F).

Compliance Methods for the Above (Description and Citation):

Copies of the performance test results (submitted for Unit 3 on June 7, 2009, Unit 2 on July 1, 2010 and Unit 1 on June 28, 2011) are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

Maintain records of hours of operation, amount of fuel used, and emission calculations for emission limits defined in Condition II.B.2 (PSD Permit AZ 08-01A Condition IX.G.1, IX.G.2, and IX.G.3).

Compliance Methods for the Above (Description and Citation):

Copies of the required records are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

Maintain CEMS records that contain the following: occurrence and duration of any startup, shutdown or malfunction, performance testing, evaluations, calibrations, checks, adjustments, maintenance, duration of any periods during which a continuous monitoring system or monitoring device is inoperative, and emissions measurements (PSD Permit AZ 08-01A Condition IX.G.4).

Compliance Methods for the Above (Description and Citation):

Copies of the required records are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

After the 18 month Demonstration Period for each LNB/SOFA system, the Permittee shall submit to EPA a written report together with CO CEMS data showing actual CO emissions which evaluates whether a lower CO emissions limit can be consistently and reasonably achieved while maintaining NOx emission levels at or below 0.24 lb/MMBtu on a 30-day rolling average (PSD Permit AZ 08-01A Condition IX.C.2).

Compliance Methods for the Above (Description and Citation):

Report for Unit 3 was submitted on November 15, 2010, Unit 2 on January 20, 2012 and Unit 1 on January 8, 2013. Copies of the required records are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance



**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): U1, U2, & U3

Permit Term (Describe requirements and cross-reference)

SO<sub>2</sub> ≤ 1.0 lb/MMBtu from Units 1, 2, and 3, averaged over any 3-hour period, on a plant-wide basis. Maintain and operate CEMS for SO<sub>2</sub> on Units 1, 2, and 3, and comply with quality assurance procedures found in 40 CFR Part 75 (Condition II.A.2.a of Permit Reopening).

Compliance Methods for the Above (Description and Citation):

Records and copies of reports demonstrating compliance with these requirements are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): U1, U2, & U3

Permit Term (Describe requirements and cross-reference)

PM ≤ 0.060 lb/MMBtu on a plant-wide basis, as determined by annual mass emission tests, based on an average of at least three sampling runs per stack (Condition II.A.2.b of Permit Reopening).

Compliance Methods for the Above (Description and Citation):

Copies of test reports demonstrating compliance with the PM limit are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): U1, U2 & U3

Permit Term (Describe requirements and cross-reference)

Opacity ≤ 20% from Units 1, 2, and 3, excluding uncombined water droplets, averaged over any 6 minute period and ≤40%, averaged over any 6 minute period during absorber upset transition periods. Maintain and operate Continuous Opacity Monitoring Systems (COMS) on Units 1, 2, and 3 and comply with the quality assurance procedures in 40 CFR Part 75 (Condition II.A.2.d of Permit Reopening).

Compliance Methods for the Above (Description and Citation):

Records and copies of reports demonstrating compliance with these requirements are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): Auxiliary Boiler

Permit Term (Describe requirements and cross-reference)

During any calendar year in which an auxiliary boiler is operated for 720 hours or more, and at any other time requested by the Administrator, conduct mass emission tests for SO<sub>2</sub>, NO<sub>x</sub>, and PM (Condition II.A.3.c of Permit Reopening).

Compliance Methods for the Above (Description and Citation):

No testing was required during this reporting period.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): Fugitive Dust Sources

Permit Term (Describe requirements and cross-reference)

Operate and maintain the existing dust suppression methods for controlling dust from the coal handling and storage facilities. Submit a description of the dust suppression methods for controlling dust from the coal handling and storage facilities, fly ash handling and storage, and road sweeping activities. Opacity ≤ 20% from any crusher, grinding mill, screening operation, belt conveyer, truck loading and unloading operation, or railcar unloading station, as determined using 40 CFR Part 60, Appendix A-4, Method 9 (Condition II.A.2.c of Permit Reopening).

Compliance Methods for the Above (Description and Citation):

Copies of the records demonstrating compliance with these requirements are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): Monitoring Station

Permit Term (Describe requirements and cross-reference)

Install, maintain and operate ambient monitors at Glen Canyon Dam for PM<sub>2.5</sub>, PM<sub>10</sub>, NO<sub>2</sub>, SO<sub>2</sub> and ozone. Report data to the Regional Administrator annually (Condition II.A.3.f of Permit Reopening).

Compliance Methods for the Above (Description and Citation):

Copies of records and reports demonstrating compliance with this requirement are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

Monitor parameters per CAM Requirements (Condition II.C.1 of Permit Reopening).

Compliance Methods for the Above (Description and Citation):

Copies of records and reports demonstrating compliance with this requirement are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

Continuously monitor and log measurements of parameters for each ESP unit and wet limestone scrubber (Condition II.C.3 of Permit Reopening).

Compliance Methods for the Above (Description and Citation):

Copies of records and reports demonstrating compliance with this requirement are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

At all times, maintain monitoring equipment and maintain necessary parts for repairs of the monitoring equipment (Condition II.C.4 of Permit Reopening).

Compliance Methods for the Above (Description and Citation):

Maintenance records are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

At all times the pollutant-specific emissions unit is in operation, all monitoring shall be conducted in continuous operation (Condition II.C.5 of Permit Reopening).

Compliance Methods for the Above (Description and Citation):

Monitoring records are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

Upon detecting an excursion, restore operation of the emission unit to normal operation consistent with good air pollution control practices for minimizing emissions (Condition II.C.6 of Permit Reopening).

Compliance Methods for the Above (Description and Citation):

Maintenance and operating records are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference) Report excursions or exceedances and the action taken to implement a Quality Improvement Plan (QIP) (Condition II.C.9 of Permit Reopening).

Compliance Methods for the Above (Description and Citation):

Monitoring records are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance\*

Emission Unit ID(s): Fugitive Dust Sources

Permit Term (Describe requirements and cross-reference)

Operate powdered activated carbon (PAC), calcium bromide (CaBr) and cement kiln dust (CKD) truck traffic within the specified limits (Permit AZ 08-01A Conditions X A.1-3). Maintain affected roadways with dust suppressants or other dust control measures such that visible fugitive dust emissions do not exceed 20% opacity (Permit AZ 08-01A Condition X A. 4). Load vehicles to prevent dropping, leaking, blowing or otherwise escaping. Material spillage shall be cleaned immediately (Permit AZ 08-01A Condition X A. 5). Post 15 MPH or lower speed limit signage visible to truck traffic (Permit AZ 08-01A Condition X A. 6).

Compliance Methods for the Above (Description and Citation):

Copies of the records demonstrating compliance with these requirements are maintained on site.

Note: The cement kiln dust (CKD) system was not installed, therefore no equipment associated with this process was in operation.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions

Emission Unit ID(s): PAC Silo A, PAC Silo B, DC-12, DC-13, CKD Storage Silos DC-14 through DC-16, and CKD Bins DC-17 and DC-18

Permit Term (Describe requirements and cross-reference)

Conduct weekly visual emissions survey for each baghouse using Method 22. If visible emissions are detected, permittee shall perform Method 9 observation. If Method 9 readings exceed 7%, permittee shall take corrective so that within 24 hours no visible emissions are detected (Permit AZ 08-01A Condition X.B.1-4). Inspect and replace baghouse or dust collection filters to insure proper operation (Permit AZ 08-01A Condition X.B.5). Maintain inventory of spare dust collector bags or filters so as to ensure rapid replacement in event of bag or filter failure (Permit AZ 08-01A Condition X.B.6). Maintain records of road dust control activities (Permit AZ 08-01A Condition X.B.7). Perform monthly inspections of water flow to road watering systems or equipment nozzles, initiate corrective action within 24 hours and document all activities (Permit AZ 08-01A Condition X.B. 8)

Compliance Methods for the Above (Description and Citation):

Copies of the records demonstrating compliance with these requirements are maintained on site.

Note: The cement kiln dust (CKD) system was not installed, therefore no equipment associated with this process was in operation.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**C. DEVIATIONS FROM PERMIT TERMS AND CONDITIONS**

Report all deviations from permit terms (whether reported previously or not) that occurred during the permit term. Cross-reference deviations already reported in the six-month report. Indicate whether each deviation is a possible exception to compliance. Start and end period of each deviation should be in mo/day/yr, hr:min format (24-hour clock). Also specify the date when the written deviation report was submitted (If written report required, but not submitted, leave the date field blank).

Permit Term for Which There was a Deviation: None

Emission Units (unit IDs):

Deviation Start \_\_\_\_/\_\_\_\_/\_\_\_\_ \_\_\_\_:\_\_\_\_ End: \_\_\_\_/\_\_\_\_/\_\_\_\_ \_\_\_\_:\_\_\_\_

Date Written Report Submitted \_\_\_\_/\_\_\_\_/\_\_\_\_

Permit Term for Which There was a Deviation:

Emission Units (unit IDs):

Deviation Start \_\_\_\_/\_\_\_\_/\_\_\_\_ \_\_\_\_:\_\_\_\_ End: \_\_\_\_/\_\_\_\_/\_\_\_\_ \_\_\_\_:\_\_\_\_

Date Written Report Submitted \_\_\_\_/\_\_\_\_/\_\_\_\_

Permit Term for Which There was a Deviation:

Emission Units (unit IDs):

Deviation Start \_\_\_\_/\_\_\_\_/\_\_\_\_ \_\_\_\_:\_\_\_\_ End: \_\_\_\_/\_\_\_\_/\_\_\_\_ \_\_\_\_:\_\_\_\_

Date Written Report Submitted \_\_\_\_/\_\_\_\_/\_\_\_\_

Permit Term for Which There was a Deviation:

Emission Units (unit IDs):

Deviation Start \_\_\_\_/\_\_\_\_/\_\_\_\_ \_\_\_\_:\_\_\_\_ End: \_\_\_\_/\_\_\_\_/\_\_\_\_ \_\_\_\_:\_\_\_\_

Date Written Report Submitted \_\_\_\_/\_\_\_\_/\_\_\_\_

SIXMON

**Attachment 2. Semiannual Monitoring Report**



OMB No. 2060-0336, Approval Expires 04/30/2012

Federal Operating Permit Program (40 CFR Part 71)

**6-MONTH MONITORING REPORT (SIXMON)**

**Section A (General Information)**

Permit No. NN-ROP-05-06

Reporting Period: Beg. 7 / 1 / 2017 End. 12 / 31 / 2017

Source / Company Name SRP Navajo Generating Station

Mailing Address: Street or P.O. Box P.O. Box 850

City Page State AZ ZIP 86040 -

Contact person Kenneth J. Frazier Title Plant Manager

Telephone ( 928 ) 645 - 6217 Ext.

Continued on next page



# SIXMON

## Section B (Monitoring Report)

Summarize all required monitoring, data, or analyses required by the permit for the reporting period. Describe and cross-reference the permit term and list the emission units (Unit IDs) where the monitoring was performed. Indicate whether a separate monitoring report is required, and if required, enter the date submitted. If submitted for the first time as an attachment to this form, assign an attachment ID, mark the attachment with that ID, and attach the report to this form.

Monitoring, Data, or Analysis Required by the Permit	Emission Units (Unit IDs)	Separate Monitoring Report?	Date of Separate Report Submittal or Attachment ID
Continuous emission monitoring for NO <sub>x</sub> (Condition 2 and Attachment A, Acid Rain Permit NN-07-01). Each unit is subject to an annual average NO <sub>x</sub> limit of 0.40 lb/MMBtu pursuant to 40 CFR 76.8(d)(2) (NO <sub>x</sub> early election compliance plan).  <b>Reports demonstrating compliance with this requirement were submitted to EPA on the dates indicated.</b>	U1, U2, U3	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Acid Rain EDRs to EPA 10 / 26 / 2017 1 / 26 / 2018
Continuous emission monitoring for SO <sub>2</sub> (Condition 1 and Attachment A, Acid Rain Permit NN-07-01). Each unit is subject to an annual SO <sub>2</sub> Acid Rain (Phase II) allowance allocation.  <b>Reports demonstrating compliance with this requirement were submitted to EPA on the dates indicated.</b>	U1, U2, U3	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Acid Rain EDRs to EPA 10 / 26 / 2017 1 / 26 / 2018
Continuous emission monitoring for SO <sub>2</sub> (Conditions II.B.3, II.B.4, and II.B.5). The facility is subject to a plantwide rolling 365 boiler operating day average emission limit of 0.10 lb/MMBtu pursuant to Condition II.B.2 and 40 CFR 52.145(d)(2) (Visibility).  <b>Reports demonstrating compliance with this requirement were submitted to EPA on the dates indicated.</b>	U1, U2, U3	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Excess Emission Reports to EPA Region IX 10 / 30 / 2017 1 / 30 / 2018
Weekly visible emission survey, with follow up Method 9 within 24 hours if visible emissions are observed (Condition II.C.5, II.D.1, II.D.2, II.E2, and II.E.3). Stack emissions from transfer point ≤ 7% opacity, and fugitive emissions ≤ 10% opacity, pursuant to NSPS Subpart OOO.  <b>Records demonstrating compliance with this condition are included in Attachment 3 of this report.</b>	DC9, DC10, DC11	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Attachment ID 3
Once per 5-year permit term and at other times specified by the EPA, conduct PM performance tests for exhaust from DC9, DC10, and DC11 using EPA Method 5 or 17. Conduct a performance test within 120 days if visible emissions are observed 3 times from any one baghouse during a consecutive 12-month period (Condition II.E.1).  <b>The required performance test was conducted as required for the pending permit renewal from Navajo Nation EPA (Current Permit #NN-R0P-05-06). A report demonstrating compliance with this requirement was submitted to EPA on the date indicated. The performance testing was conducted October 23, 2017 and the report demonstrating compliance with the emissions limit was submitted on December 13, 2017.</b>	DC9, DC10, DC11	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	10 / 23 / 2017
Within 60 days of installation of the low-NO <sub>x</sub> burners, install, and thereafter operate, maintain, certify, and quality assure CEMS for CO (PSD Permit AZ 08-01A Condition IX.E.1). Submit CO CEMS performance test protocol 30 days prior to test date, and results of performance test within 60 days of completion (Condition II.B.5 and II.B.6 of Permit Reopening).  <b>Performance tests were conducted on the low-NO<sub>x</sub> burners on Unit 3 in 2009, Unit 2 in 2010, and Unit 1 in 2011.</b>	U1, U2, U3	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	6 / 28 / 2011

# SIXMON

## Section B (Monitoring Report)

Summarize all required monitoring, data, or analyses required by the permit for the reporting period. Describe and cross-reference the permit term and list the emission units (Unit IDs) where the monitoring was performed. Indicate whether a separate monitoring report is required, and if required, enter the date submitted. If submitted for the first time as an attachment to this form, assign an attachment ID, mark the attachment with that ID, and attach the report to this form.

Monitoring, Data, or Analysis Required by the Permit	Emission Units (Unit IDs)	Separate Monitoring Report?	Date of Separate Report Submittal or Attachment ID
<p>Following initial startup of low-NO<sub>x</sub> burners, NO<sub>x</sub> ≤ 0.24 lb/MMBtu (PSD Permit AZ 08-01A Condition IX.B.2), CO ≤ 0.23 lb/MMBtu on a 30-day rolling average basis (PSD Permit AZ 08-01A Condition IX.B.1.a) and CO ≤ 0.15 lb/MMBtu on a 12-Month rolling average basis (PSD Permit AZ 08-01A Condition IX.B.1.b). Submit excess emission reports semiannually 30 days after the end of each calendar quarter (PSD Permit AZ 08-01A Condition IX.G.5).</p> <p><b>Reports demonstrating compliance with this requirement were submitted to EPA on the date indicated.</b></p>	U1, U2, U3	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Excess Emission Report to EPA Region IX 10 / 30 / 2017 1 / 30 / 2017
<p>Conduct a thirty day initial performance test for NO<sub>x</sub> and CO with the CEMS starting the day after successful completion of the performance testing for the CO CEMS. Submit report within 30 days of completion (PSD Permit AZ 08-01A Condition IX.F).</p> <p><b>Performance test results were submitted for Unit 3 in 2009, Unit 2 in 2010 and Unit 1 in 2011.</b></p>	U1, U2, U3	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	6 / 28 / 2011
<p>After the 18 month Demonstration Period for each LNB/SOFA system, the Permittee shall submit to EPA a written report together with CO CEMS data showing actual CO emissions which evaluates whether a lower CO emissions limit can be consistently and reasonably achieved while maintaining NO<sub>x</sub> emission levels at or below 0.24 lb/MMBtu on a 30-day rolling average (PSD Permit AZ 08-01A Condition IX.C.2).</p> <p><b>A report meeting this requirement was submitted to EPA on 11/15/2010 for Unit 3, on 1/20/2012 for Unit 2 and 1/08/2013 for Unit 1.</b></p>	U1, U2, U3	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	1 / 08 / 2013 -
<p>SO<sub>2</sub> ≤ 1.0 lb/MMBtu from Units 1, 2, and 3, averaged over any 3-hour period, on a plantwide basis (Condition II.A.2 of Permit Reopening). Maintain and operate CEMS for SO<sub>2</sub> on Units 1, 2 and 3 in accordance with 40 CFR 60.8 and 60.13(e), (f), and (h), and Appendix B of Part 60. Comply with the quality assurance procedures for CEMS found in (Condition II.A.3 of Permit Reopening).</p> <p><b>Reports demonstrating compliance with this requirement were submitted to EPA on the dates indicated.</b></p>	U1, U2, U3	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Excess Emission Report to EPA Region IX 10 / 30 / 2017 1 / 30 / 2017
<p>PM ≤ 0.060 lb/MMBtu, on a plantwide basis, as determined by annual mass emissions tests conducted on Units 1, 2, and 3, operating at rated capacity, using coal that is representative of that normally used (Condition II.A.2.b of Permit Reopening).</p> <p><b>A report demonstrating compliance with this requirement was submitted to EPA on the date indicated.</b></p>	U1, U2, U3	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	8 / 03 / 2017 - -
<p>Opacity from the stacks of Units 1, 2, or 3 ≤ 20%, excluding condensed uncombined water droplets, averaged over any six (6) minute period. Opacity from the stacks of Units 1, 2 or 3 ≤ 40% opacity, averaged over six (6) minutes, during absorber upset transition periods. Maintain and operate COMS on Units 1, 2, and 3 in accordance with CFR 60.8 and 60.13(e), (f), and (h), and Appendix B of Part 60, and comply with the quality assurance procedures in 40 CFR Part 75 (Condition II.A.2.d of Permit Reopening). (NGS FIP – 40CFR §49.24(d)(4) and §49.24(e)(1)).</p> <p><b>Reports demonstrating compliance with this requirement were submitted to the EPA on the dates indicated.</b></p>	U1, U2, U3	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Excess Emission Report to EPA Region IX 10 / 30 / 2017 1 / 30 / 2017

**Section B (Monitoring Report)**

Summarize all required monitoring, data, or analyses required by the permit for the reporting period. Describe and cross-reference the permit term and list the emission units (Unit IDs) where the monitoring was performed. Indicate whether a separate monitoring report is required, and if required, enter the date submitted. If submitted for the first time as an attachment to this form, assign an attachment ID, mark the attachment with that ID, and attach the report to this form.

Monitoring, Data, or Analysis Required by the Permit	Emission Units (Unit IDs)	Separate Monitoring Report?	Date of Separate Report Submittal or Attachment ID
<p>Operate and maintain the existing dust suppression methods for controlling dust from the coal handling and storage facilities. Submit a description of the dust suppression methods for controlling dust from the coal handling and storage facilities, fly ash handling and storage, and road sweeping activities. Opacity &lt; 20% from any crusher, grinding mill, screening operation, belt conveyor, truck loading and unloading operation, or railcar unloading station, as determined using 40 CFR Part 60, Appendix A-4, Method 9 (Condition II.A.2.c of Permit Reopening).</p> <p><b>Records demonstrating compliance with these requirements are maintained on site.</b></p>	Fugitive Dust	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	6 / 04 / 2010 —
<p>During any calendar year in which an auxiliary boiler is operated for 720 hours or more, and at other times as requested by the Administrator, conduct mass emissions tests for SO<sub>2</sub>, NO<sub>x</sub> and /or PM on the auxiliary steam boilers, operating at rated capacity, using oil that is representative of that normally used. (Condition II.A.3.c of Permit Reopening).</p> <p><b>The auxiliary boiler was not operated for more than 720 hours this year, and no testing has been requested. Therefore, no testing was required during this reporting period.</b></p>	Aux Boiler	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<p>Maintain and operated ambient monitors at Glen Canyon Dam for PM<sub>2.5</sub>, PM<sub>10</sub>, NO<sub>x</sub>, SO<sub>2</sub> and ozone. Report data annually to the Regional Administrator (Condition II.A.3.f of Permit Reopening).</p> <p><b>The required annual report demonstrating compliance with this requirement will be submitted within the 60 days after year end.</b></p>	Ambient Monitors	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	2 / 28 / 2017
<p>Monitor, log and record parameters according to the requirements in the CAM plan. Excursions or exceedances shall be reported and Quality Improvement Plan (QIP) shall be implemented if excursions occur (Condition II.C. of Permit Reopening).</p> <p><b>Records demonstrating compliance with these requirements are maintained on site.</b></p>	U1, U2, U3	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<p>Conduct weekly visual emissions survey for each baghouse using Method 22. If visible emissions are detected, perform Method 9 observation. If Method 9 readings exceed 7%, take corrective so that within 24 hours no visible emissions are detected (Condition X.B.1-8).</p> <p><b>Records demonstrating compliance with this condition are included in Attachment 4 of this report.</b></p>	PAC Silo A, PAC Silo B, DC-12, DC-13, CKD Storage Silos DC-14 through DC-16 and CKD Bins DC-17 and DC-18	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Attachment ID 4

### Section C (Deviations Already “Promptly” Reported)

Summarize all deviations from permit terms already reported on form **PDR** during the reporting period. Copy this page as many times as necessary to include all such deviations. Describe and cross-reference the permit terms and report the start and end dates and times of the deviations (mo/day/yr, hr:min). Use the 24-hour clock. Also specify the date when the written deviation report was submitted to the permitting authority (If written report required, but not submitted, leave the date field blank). Note that failure to submit a deviation report, or late submittal, is a deviation that must be reported in the Section D.

Permit Term for Which There was a Deviation: None

Emission Units (unit IDs): Unit 3

Deviation Start \_\_\_\_/\_\_\_\_/\_\_\_\_ \_\_\_\_:\_\_\_\_ End: \_\_\_\_/\_\_\_\_/\_\_\_\_ \_\_\_\_:\_\_\_\_

Date Written Report Submitted \_\_\_\_/\_\_\_\_/\_\_\_\_

Permit Term for Which There was a Deviation:

Emission Units (unit IDs): Unit 3

Deviation Start \_\_\_\_/\_\_\_\_/\_\_\_\_ \_\_\_\_:\_\_\_\_ End: \_\_\_\_/\_\_\_\_/\_\_\_\_ \_\_\_\_:\_\_\_\_

Date Written Report Submitted \_\_\_\_/\_\_\_\_/\_\_\_\_

Permit Term for Which There was a Deviation:

Emission Units (unit IDs): Unit 3

Deviation Start \_\_\_\_/\_\_\_\_/\_\_\_\_ \_\_\_\_:\_\_\_\_ End: \_\_\_\_/\_\_\_\_/\_\_\_\_ \_\_\_\_:\_\_\_\_

Date Written Report Submitted \_\_\_\_/\_\_\_\_/\_\_\_\_

Permit Term for Which There was a Deviation:

Emission Units (unit IDs): Unit 3

Deviation Start \_\_\_\_/\_\_\_\_/\_\_\_\_ \_\_\_\_:\_\_\_\_ End: \_\_\_\_/\_\_\_\_/\_\_\_\_ \_\_\_\_:\_\_\_\_

Date Written Report Submitted \_\_\_\_/\_\_\_\_/\_\_\_\_

## Section D (Deviations Reported Semiannually)

This section is for deviations reported for the first time in this six-month monitoring report. Describe and cross-reference the permit terms and emission units that apply to the deviation. Copy this page as many times as necessary to include all such deviations. Report the beginning and ending times (mo/day/yr, hr:min) for each deviation. Use the 24-hour clock. Briefly explain (if known) the probable cause of each deviation. If any corrective actions or preventative measures have been taken to avoid these in the future, briefly describe the measures, including when they occurred.

Permit Term (for Which There is a Deviation):  
Emission Units (unit IDs) Unit 3

Deviation Start: \_\_\_\_/\_\_\_\_/\_\_\_\_ \_\_\_\_:\_\_\_\_ End: \_\_\_\_/\_\_\_\_/\_\_\_\_ \_\_\_\_:\_\_\_\_

Probable Cause of Deviation:

Corrective Actions or Preventative Measures Taken

Permit Term (for Which There is a Deviation):  
Emission Units (unit IDs) Unit 3

Deviation Start: \_\_\_\_/\_\_\_\_/\_\_\_\_ \_\_\_\_:\_\_\_\_ End: \_\_\_\_/\_\_\_\_/\_\_\_\_ \_\_\_\_:\_\_\_\_

Probable Cause of Deviation:

Corrective Actions or Preventative Measures Taken:

Permit Term (for Which There is a Deviation):  
Emission Units (unit IDs) Unit 3

Deviation Start: \_\_\_\_/\_\_\_\_/\_\_\_\_ \_\_\_\_:\_\_\_\_ End: \_\_\_\_/\_\_\_\_/\_\_\_\_ \_\_\_\_:\_\_\_\_

Probable Cause of Deviation:

Corrective Actions or Preventative Measures Taken:

**Attachment 3. Summary of Limestone Handling System  
Visible Emissions Observations**

**Navajo Generating Station**  
**Summary of Limestone Handling System Visible Emissions Observations**  
**Permit No. NN-ROP-05-06, Condition II.E.2 and II.E.3**

Period beginning: 07 / 01 / 17  
 Period ending: 12 / 31 / 17

Date	Units Observed	Observer Initials	Visible Emissions?	Comments
07/05/17	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
07/12/17	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
07/19/17	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
07/27/17	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
08/03/17	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
08/10/17	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
08/17/17	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
08/23/17	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
08/29/17	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
09/06/17	DC9, DC10, DC11	JRA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
09/13/17	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
09/20/17	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
09/28/17	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
10/04/17	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
10/11/17	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
10/18/17	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
10/25/17	DC9, DC10, DC11	JRA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
11/02/17	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
11/09/17	DC9, DC10, DC11	JRA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
11/16/17	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
11/21/17	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
11/30/17	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
12/07/17	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
12/13/17	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
12/19/17	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
12/28/17	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

**Attachment 4. Summary of Powdered Activated Carbon (PAC) and Refined Coal  
Visible Emissions Observations**



**Navajo Generating Station**  
**Summary of Powder Activated Carbon (PAC) and Refined Coal Visible Emissions Observations**  
**Permit No. AZ 08-01A, Special Conditions Pursuant to 40 CFR 49.151-161 - NSR**

Period beginning: 07 / 01 / 17  
 Period ending: 12 / 31 / 17

Date	Units Observed	Observer Initials	Visible Emissions?	Comments
07/05/17	PAC Silo A, PAC Silo B, DC-12 & 13.	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
07/12/17		WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
07/19/17		WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
07/27/17		WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
08/03/17		WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
08/10/17		WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
08/17/17		WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
08/23/17		WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
08/29/17		WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
09/06/17		JRA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
09/13/17		WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
09/20/17		WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
09/28/17		WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
10/04/17		WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
10/11/17		WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
10/18/17		WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
10/25/17		JRA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
11/02/17		WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
11/09/17		JRA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
11/16/17		WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
11/21/17		WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
11/30/17		WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
12/07/17		WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
12/13/17		WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
12/19/17		WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
12/28/17		WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

**Attachment 5. Certification of Truth, Accuracy, and Completeness**



APPLICATION FOR PART 71 FEDERAL OPERATING PROGRAM  
NAVAJO NATION ENVIRONMENTAL PROTECTION AGENCY  
AIR QUALITY CONTROL PROGRAM / OPERATING PERMIT PROGRAM



FORM CTAC – CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS BY RESPONSIBLE OFFICIAL

**Instruction:** One copy of this form must be completed, signed and sent with each submission of documents (i.e. application forms, updates to applications, reports, or any information required by a Part 71 Permit)

**Responsible Official** - Identify the responsible official and provide contact information.

Name: (Last) Frazier (First) Kenneth (Middle) J.

Title: Plant Manager

Street or Post Office: P.O. Box 850

City: Page

State: Arizona



Zip: 86040

Telephone: 9286456217

Ext:

Facsimile: 9286457298

**Certification of Truth, accuracy and Completeness** – The Responsible Official must sign this Statement.

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.

Name (signed):

Name (Print or Typed) Kenneth J. Frazier

Date: